



State of Utah
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY

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DIVISION OF
OIL GAS & MINING

February 9, 1993

Mr. E. K. York, Manager
Moab Salt, Inc.
P.O. Box 1208
Moab, Utah 84532

RE: Review of Draft Permit (No.
UTU300001), Request for Information

Dear Mr. York:

Enclosed for your review and comment is a draft copy of Moab Salt's Class III permit renewal. There are no major changes from the way things have been done in the past. However, as discussed, the injection/extraction ratio may need to be changed slightly to reflect current operating conditions. Some quality assurance guidelines have been added as well as some RTS MIT procedures. The latter were given to you in prior correspondence, so the only change is to incorporate the procedures into the permit.

Following are some items that must be addressed before the permit can be issued:

1. Where appropriate, references to the **Utah Water Pollution Control Committee** must be changed to the **Utah Water Quality Board** in the sections on Financial Guarantee Bond and Standby Trust Agreement (see green flagged comments). Since these documents were provided by Moab Salt, Inc., the changes must be made accordingly.
2. If different from the previous permit, the proper injection/extraction ratio must be determined (with a rationale statement) and submitted as discussed.
3. As previously discussed, three items under Item 12 in the permit application Technical Report refer to a document which cannot be located ("Outline - Mine Operation, Texasgulf Chemicals Company Cane Creek Potash Solution Mine"), as follows:

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Item 12(a), which asks for expected maximum and average injection pressures.

Item 12(c), which asks for provisions for continuing activities necessary for proper well maintenance and operation.

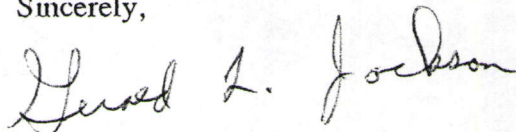
Item 12(d), which asks for a contingency plan and description of facilities to cope with well failures or shut-in.

One of the following must occur prior to permit issuance:

- (a) The referenced document must be located and provided to us, or
- (b) Each of the three items must be directly addressed and the responses forwarded to us.

Please forward your comments on the draft permit and the above items as soon as possible. Subsequent to the receipt of your consideration of the above, the permit will public notice for formal comment. If you have any questions, please call me at 538-6146.

Sincerely,



Gerald L. Jackson, Environmental Scientist
Ground Water Protection Section

Enclosure

GLJ:JJ:gt

cc: Southeast District Health Dept.
David Ariotti, District Engineer
Div. of Oil, Gas & Mining

P:MSDRJT